

REMARKS/ARGUMENTS

Favorable reconsideration of this application in light of the following discussion is respectfully requested.

Claims 1-7, 22-31, 42 and 49-56 are pending in this Application. Claims 8-21, 32-41, and 43-48, and 50 were previously canceled without prejudice or disclaimer. Claims 22-31 and 51-54 have been withdrawn from consideration. Claims 1-5, 42, 49, 55, and 56 have been amended without the introduction of any new matter. Note, for example, FIG.1 (also note, for example, page 13, line 14-page 14, line 22), FIG. 8 (also note, for example, page 14, line 20-page 15, line 23), FIGS. 2-6, 8, 9, and 10, for example.

The outstanding Action presents a rejection of Claims 1-7, 42, 49, 55, and 56 under 35 U.S.C. § 103(a) over Izuka (U.S. Patent No. 5,552,228) in view of Ikegame (JP 10-116431), a rejection of Claim 7 under 35 U.S.C. § 103(a) over Izuka in view of Ikegame and further in view of Kubo (JP 07-105552).

Turning to the rejection of independent Claims 1 and 42, it is asserted by the outstanding Action that Figures 11-12 of Izuka teaches “a coil unit (28) comprising a single laminate structure . . . including at least one focus coil (31) configured to provide focusing movement . . . , at least one tracking coil (34) configured to provide tracking movement” However, amended independent Claim 1 requires the single laminate structure to include “plural printed circuit boards each mounting at least one coil of a plurality of coils” (emphasis added) and amended independent Claim 42 requires “a single laminate structure disposed within the single gap and including plural coils formed on plural circuit boards” (emphasis added). Izuka does not teach or suggest any thing but using the illustrated single coil mounting plate 28 to mount all coils in the Izuka disclosed gap.

Turning to Ikegame, this reference teaches two printed coils 23 and 24 formed on two boards, but these boards and their coils must be mounted in separate magnetic gaps if the teachings of Ikegame are followed.

Therefore, neither Izuka nor Ikegame teach the use of a plurality of printed circuit boards positioned in one magnetic gap that mount a plurality of coils in that gap as Claims 1 and 42 require. It is well established that a *prima facie* case of obviousness requires that all claim limitations be considered and demonstrated to be taught or suggested by the prior art, see MPEP §2143.03.

Therefore, withdrawal of the improper rejection of independent Claims 1 and 42 under 35 U.S.C. § 103(a) over Izuka in view of Ikegame is respectfully requested.

Moreover, as Claims 2-7, 49, 55, and 56 all depend from one of these independent claims and include all the limitations thereof, the rejection of Claims 2-7, 49, 55, and 56 under 35 U.S.C. § 103(a) over Izuka in view of Ikegame is noted to also be improper for the reasons noted as to the independent Claims 1 and 42 and withdrawal of this improper rejection is respectfully requested for this reason.

In addition, independent Claims 1 and 42 have been amended to require that “plural tilt coils” must be “contained together on one of the plural printed circuit boards.”

Page 4 of the outstanding Action relies on Ikegame, at paragraph [0028], Fig 12, reference Nos. 23, 24 (including tilt coils 5, 6) and an assertion that Ikegame teaches a coil unit comprising a “laminated” structure as to this paragraph [0028] and Fig. 12, reference Nos. 23, 24. The outstanding Action (at page 9, fourth full paragraph) also relies on Ikegame as suggesting “the use of a tilt coil disposed in a gap configured to provide inclination adjusting tilting movement of the laminent structure different from the focusing movement and the tracking movement for compensating for tilt disturbance.”

However, the tilt compensation taught by Ikegame requires supplying currents through the two coils 5 and 6 that are separately provided as distinct parts of separate printed coils 23 and 24 described in paragraph [0028]. Thus, there is also no reasonable teaching or suggestion in Ikegame or Izuka of the “plural tilt coils” that must be “contained together on one of the plural printed circuit boards” required by amended independent Claims 1 and 42.

Once again it is noted to be well established that a *prima facie* case of obviousness requires that all claim limitations be considered and demonstrated to be taught or suggested by the prior art, see MPEP §2143.03.

Therefore, withdrawal of the improper rejection of independent Claims 1 and 42 under 35 U.S.C. § 103(a) over Izuka in view of Ikegame is respectfully requested for this reason as well as the reason noted above.

Moreover, as Claims 2-7, 49, 55, and 56 all depend from one of these independent claims and include all the limitations thereof, the rejection of Claims 2-7, 49, 55, and 56 under 35 U.S.C. § 103(a) over Izuka in view of Ikegame is noted to also be improper for this reason as well as the previously noted reason and withdrawal of this improper rejection is again respectfully requested.

Furthermore, as neither Izuka nor Ikegame teach the subject matter of dependent Claims 2-7, 49, 55, and 56, withdrawal of this improper rejection is respectfully requested for this reason as well. For example, neither of the relied on references even remotely suggest the requirement of Claim 4 that the “plural printed circuit boards include a plurality of alternating first and second integrated printed circuit boards” or the Claim 56 requirement that:

only one laminate structure including the focus, tracking, and tilt coils is disposed in the gap and coupled with the lens holder with three pairs of conductive elastic members being configured to have one conductive elastic member of each pair connected to one side of the one laminate structure and the second conductive elastic member of each pair connected to a side of the one laminate structure opposite to the one side, with each pair of elastic

conductive members configured to provide elastic support for the one laminate structure and coupled the lens holder while supplying current exclusively to only one of the focus, tracking, and tilt coils.

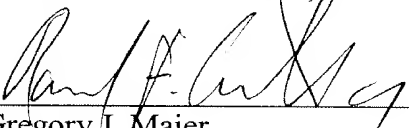
With additional regard to Claim 7 and the added reliance on Kubo, it is noted that Kubo does not cure the deficiencies noted above as to the primary references to Izuka and Ikegame.

Therefore, the withdrawal of the rejection of Claim 7 over Izuka in view of Ikegame and further in view of Kubo is also respectfully requested.

Accordingly, as no other issues are believed to remain outstanding relative to this application, it is believed to be clear that this application is in condition for formal allowance and an early and favorable action to this effect is, therefore, respectfully requested.

Respectfully submitted,

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